

August 12, 2005

Nebraska Public Service Commission:

The City of Lincoln Emergency Communications Center is commenting on Application No. 911-014/PI-99 – open docket before the Public Service Commission relative to the state of landline and enhanced wireless 911 service.

Item 1. The current status of landline 911 in each county. Lincoln/Lancaster County was the first municipality in the State of Nebraska to provide wireline 911 service, beginning in 1968. The current system is well established and is used as the primary contact by citizens requesting emergency assistance.

Item 2. The rate and use of the landline 911 surcharge in each county.

Lincoln/Lancaster County wireline surcharge is currently set at \$1.00 per access line per month. Income from the landline 911 surcharge does not provide sufficient funding to financially support the 911 operations and service for Lincoln/Lancaster County. The 2005/2006 adopted budget for the Lincoln Emergency Communications Center is \$3,053,000, with \$1,309,000 to be provided by the wireline surcharge and the remainder provided from the City and County's General Funds. The City has budgeted \$1,622,000 and the County \$122,000 of General Funds.

Item 3. The current status of enhanced wireless 911 throughout the state. The Lincoln/Lancaster County Emergency Communications Center currently has 5 of 7 wireless carriers providing Phase I wireless service. The Lincoln/Lancaster County Emergency Communications Center is ready, and able to provide Phase II service to the second largest population center in the state pending approval from the Public Service Commission. It is a travesty that we are not being allowed to move forward with Phase II implementation. While the Lincoln-Lancaster 911 Center has wireless carriers willing to provide us with Phase II service, we cannot proceed due to the high costs that we would be charged by Alltel, our Local Exchange Carrier (LEC), for Phase II implementation with no assurance of cost recovery from the PSC.

Item 4. Implementation of Phase I and Phase II enhanced wireless 911 in other states. The Lincoln Emergency Communications Center urges the Public Service Commission to study the methods and results of surrounding state's wireless implementations to learn from their successes and failures. Phase I and Phase II are not

new processes and any study should not delay further implementation of Phase I and Phase II in the State of Nebraska.

Item 5. Reimbursement of the costs of wireless service providers. While the purpose of the wireless 911 fund was to reimburse and provide cost recovery for carriers and Public Safety Answering Points (PSAPs), it would appear that the carriers and LECs are receiving significant amount of refunds, while the PSAPs struggle to meet the needs of the citizens and public safety agencies they serve with declining wireline 911 surcharge revenues.

Item 6. Distribution of the wireless surcharge. The Lincoln Emergency Communications Center believes that the current cost recovery is too heavily weighted in favor of the exchange carriers. While we have been a recipient of funding for PSAP equipment, the amount of reimbursement going to the PSAP is much smaller than that going to the carriers with no accommodation for operational costs, staffing and training.

Item 7. Consolidation of oversight of landline and wireless 911. The City of Lincoln believes that 911 should remain a locally provided service and introduction of state oversight would be a duplication of services to the process and level of service. The State does not provide 911 service anywhere in the state, and oversight should remain at the local level by those receiving the services. The Lincoln-Lancaster County 911 Center is currently nationally accredited and surpasses all levels of security. Additional oversight is not necessary. The larger cities in the state provide a high level of service and introduction of more bureaucracy would not be in the best interest of the people we serve.

Item 8. Consolidation of public safety answering points. The Lincoln Emergency Communications Center believes that there are areas within the state where consolidation may be necessary. . We strongly suggest that there are several other considerations which should be evaluated when considering consolidation such as agencies served and radio communication available to those agencies. Taking the call is the easy part; consideration must be given to dispatch policies, procedures and capabilities. The Lincoln Emergency Communications Center has been a consolidated PSAP since it was formed in 1978 and any additional consolidation would have to be evaluated very carefully. To add geographical area served and duties to our center would require a new facility, additional staff, increased training funds and many other cost considerations.

Item 9. Availability of federal funding, including homeland security funds for projects in Nebraska. While these funds were abundant after September 11th, the Lincoln Emergency Communications Center did not receive funding for any of the “non-radio” projects that were submitted to the State. The public safety agencies in our area did receive considerable funding for replacement radios and other radio related projects. It is anticipated that future Homeland Security funding will focus on population centers and entry points into the US, particularly the coastal areas.

Please do not hesitate to contact us if you have any questions.

Sincerely,

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